



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
WASHINGTON, DC

08 MAR 1998

MEMORANDUM FOR ALMAJCOM-FOA-DRU/FM/LGC/PK

SUBJECT: Automated Business Services System (ABSS) Electronic Signatures – Interim Policy

As the deployment of ABSS progresses, many field activities raised valid concern about the acceptability of the electronic signature process currently used by ABSS. The purpose of this policy letter is to assure both the comptroller and the contracting communities that the methodology currently being used by ABSS, with a slight process modification, is acceptable as an interim solution and supported by published guidance.

ABSS electronically routes commitment documents to the Financial Services Office (FSO) and, if applicable, to Air Force Contracting and Defense Finance & Accounting Service (DFAS) Operating Locations. In lieu of handwritten coordination signatures, the ABSS uses a “//signed//” convention. This convention adds an electronic bitmap facsimile signature to the document in place of handwritten signatures. Concern has been expressed about the propriety of accepting this type of electronic signature. Although this bitmap facsimile signature is not a legally enforceable signature, FSOs are authorized to use the bitmap facsimile signature to certify funds availability. Contracting offices are also authorized to accept documents containing these certifications. However, until such time as a DoD public key infrastructure capability is in place, permitting the use of key-pair digital signatures, all FSO certifying officials will print, sign, and file a copy of all commitment documents forwarded to the contracting office.

The use of the interim process, requiring maintenance of a signed paper copy of commitment documents, meets the requirements of the Federal Acquisition Regulation (FAR) and DFAS regulations. In accordance with DFAS-DE Regulation 7000.5 “Accounting for Commitments,” ABSS software has lockout procedures that prevent unauthorized individuals from certifying funds availability. FAR 4.502 requires an assessment that the electronic data interchange system used is sufficient to ensure authentication and confidentiality commensurate with the risk of harm from loss, misuse or unauthorized access. Under the interim process, it has been determined that ABSS lockout procedures ensure authentication and confidentiality commensurate with risks. By printing a paper copy of the document, and filing it for future comparison, should that become necessary, the interim process provides sufficient safeguards to permit use of the bitmap facsimile signature. Additionally, the interim process also meets the requirements of FAR 32.703-2. This provision requires “written assurance from responsible authority that adequate funds are available.” The electronically transmitted document, coupled with the printed and signed paper file copy, constitutes sufficient assurance that funds are

available. Finally, the interim process satisfies the provisions of FAR Part 4, which authorizes the use of paperless initiatives in the contracting process.

ABSS is one the Air Force's leading paperless contracting initiatives and represents a true partnership between the financial and contracting communities. This partnership lays the foundation for several Air Force Electronic Commerce and Electronic Business efforts that will carry us into the 21st century. This interim policy has been coordinated with SAF/GCA, AF/JAG, and the ABSS PMO. If you have further questions, please contact Lt Col Mike Brown, SAF/FMPS, DSN 227-0292; Maj Rebecca Weirick, SAF/AQCI; DSN 425-7051, or Mr. Mark Ernst, ABSS Program Manager, DSN 787-7366.


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ROBERT F. HALE
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cc:

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